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Attorney for Defendant
REGINALD THOMAS

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

REGINALD THOMAS,

Defendant.

Case No.: 2:20-CR-00012 JAM

**STIPULATION AND ORDER
CONTINUING STATUS CONFERENCE**

STIPULATION

Defendant Reginald Thomas, by and through his undersigned counsel, and Plaintiff United States of America, by and through its counsel of record, hereby stipulate and request that the Status Conference previously set for January 18, 2022 be continued to February 8, 2022 at 9:30am. The defendant further agrees to waive time under the Speedy Trial Act pursuant to Local Code T4, defense preparation, up to and through the February 8, 2022 date.

In support of this stipulation, the parties request that the Court find the following:

1. By previous order, the Status Conference in this matter was continued to January 18, 2022 after this and defendant's related case (2:11-CR-00216) were reassigned to

1 the Honorable Judge John A. Mendez.

- 2 2. The government has represented that the discovery associated with this case
3 includes numerous reports and related documents, photographs, audio recordings,
4 and videos, and that all such discovery has been either produced directly to counsel
5 and/or made available for inspection and copying.
- 6 3. At this time, counsel for defendant requires additional time to conduct investigation
7 and research related to the charges, review discovery for this matter, discuss
8 potential resolutions, and to otherwise prepare for trial.
- 9 4. The parties stipulate that the failure to grant the above-requested continuance would
10 deny defense counsel reasonable time necessary for effective preparation, taking
11 into account the exercise of due diligence.
- 12 5. For the purposes of calculating time under the Speedy Trial Act, 18 U.S.C. § 3161,
13 et seq., the parties agree and request that the time period from January 18, 2022 to
14 February 8, 2022, inclusive, be excluded under 18 U.S.C. § 3161(h)(7)(A), B(iv)
15 [Local Code T4] upon such finding by the Court that the ends of justice served by
16 taking such action outweigh the best interest of the public and the defendant in a
17 speedy trial.

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19 IT IS SO STIPULATED.

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21 Dated: January 13, 2022

/s/ ETAN ZAITSU

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23 ETAN ZAITSU
24 Counsel for Defendant
25 REGINALD THOMAS
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1 Dated: January 13, 2022

PHILLIP A. TALBERT
Acting United States Attorney

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4 /s/ DENISE YASINOW
DENISE YASINOW
Assistant United States Attorney

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11 **FINDINGS AND ORDER**

12 IT IS SO FOUND AND ORDERED this 14th day of January, 2022.

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14 /s/ John A. Mendez
15 THE HONORABLE JOHN A. MENDEZ
16 UNITED STATES DISTRICT COURT JUDGE
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